

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

ELKAN ABRAMOWITZ
RICHARD F. ALBERT
ROBERT J. ANELLO***
LAWRENCE S. BADER
BENJAMIN S. FISCHER
CATHERINE M. FOTI
PAUL R. GRAND
LAWRENCE IASON
STEPHEN M. JURIS
JUDITH L. MOGUL
JODI MISHER PEIKIN
ROBERT M. RADICK**
JONATHAN S. SACK**
EDWARD M. SPIRO
JEREMY H. TEMKIN
RICHARD D. WEINBERG

565 FIFTH AVENUE
NEW YORK, NEW YORK 10017
(212) 856-9600
FAX: (212) 856-9494

www.maglaw.com

WRITER'S CONTACT INFORMATION
(212) 880-9515
pjanowski@maglaw.com

COUNSEL
RACHEL Y. HEMANI
JASMINE JUTEAU
BARBARA MOSES*

SENIOR ATTORNEY
THOMAS M. KEANE

ROBERT G. MORVILLO
1938-2011

MICHAEL C. SILBERBERG
1940-2002

JOHN J. TIGUE, JR.
1939-2009

*ALSO ADMITTED IN CALIFORNIA AND
WASHINGTON, D.C.

**ALSO ADMITTED IN CONNECTICUT

***ALSO ADMITTED IN WASHINGTON, D.C.

July 24, 2014

BY HAND DELIVERY AND ECF

The Honorable Shira A. Scheindlin
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Mark Allie, et al., Case No. 13-cr-00242 (SAS)

Dear Judge Scheindlin:

I represent Defendant Steve Ramsnamy in the above-captioned matter and I write to request a modification of Mr. Ramsnamy's bail conditions. Mr. Ramsnamy is currently under home detention at the home of his grandparents in the Bronx. It has been nearly three months since your Honor modified his bail conditions to home detention and to allow Mr. Ramsnamy to seek employment. I write today to request that Mr. Ramsnamy's bail conditions be modified to remove home detention and location monitoring.

Mr. Ramsnamy was originally released into the custody of his aunt to live on Long Island on August 1, 2013. He lived with her until, upon request of counsel, he reported to federal custody on October 30, 2013. He was then released by your Honor under the same conditions of bail to the custody of his grandfather on December 3, 2013. On May 2, 2014, your Honor modified his bail conditions to home detention. Since May 5, Mr. Ramsnamy has been working full-time, including some weekends, building and disassembling scaffolding. As of the end of July, he will have been released on bail for a total of eleven months.

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At this time, we believe that Mr. Ramsnamy has earned the opportunity to petition this Court for a modification of his bail conditions because of his satisfactory compliance with the terms of his release and instructions from his pre-trial services officers over the course of eleven months. As your Honor is aware, Mr. Ramsnamy was arrested in May on charges stemming from conduct alleged to have occurred nearly a year and a half ago, before the arrest in this case. From the paperwork submitted by Pre-trial Services Officer Furelli, it appears that Mr. Ramsnamy is charged with stealing his own car from a police impound lot. I understand from Mr. Ramsnamy's counsel in the Bronx that there is a very low likelihood that the case gets indicted, as the police do not believe Mr. Ramsnamy actually committed the crime. Mr. Ramsnamy was released in the Bronx on his own recognizance in part, according to counsel, because of the presiding judge's disbelief in the factual predicate of the alleged crime.

A less restrictive program will allow Mr. Ramsnamy to attend work and GED classes without having to repeatedly update his pre-trial services officer on his whereabouts. With the consent of his pre-trial services officer, Mr. Ramsnamy has already enrolled in a GED program in the Bronx. He is attending classes located at 1220 Gerard Avenue in the Bronx. His classes meet Tuesday through Thursday from 6:00pm to 9:00pm. Mr. Ramsnamy has also been successful at his new job. His boss recently gave him a raise and increased his responsibilities from laborer to mechanic's helper.

Mr. Ramsnamy understands that there is a possibility that he will be incarcerated when this case is resolved. Being off home detention will allow him to spend additional time with his eighteen-month-old daughter—who was two months old when Mr. Ramsnamy was arrested in this case—before the case is resolved. Attached as Exhibit A is a letter from Mr. Ramsnamy to your Honor explaining his desire to be a larger part of his daughter's life.

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I believe that Mr. Ramsnamy's conduct while on pre-trial release has shown that he is not a danger to the community and that a less restrictive environment is sufficient to ensure his appearance in Court. Mr. Ramsnamy's pre-trial services officer consents to the removal of location monitoring and home detention on the condition that Mr. Ramsnamy maintain employment, attend GED classes, and remain drug-free. The government deferred to Pre-trial Services. An email to this effect from Mr. Ramsnamy's pre-trial services officer is attached as Exhibit B. Attached as Exhibit C is a proposed order. Thank you for your Honor's consideration of this matter.

Respectfully,

A handwritten signature in black ink, appearing to read "Peter Janowski".

Peter Janowski

Enclosures

cc: (by email, with enclosures)
AUSA Jared Lenow
AUSA Jessica Masella
AUSA Jessica Ortiz
Mr. Gianfranco Furelli, Pre-trial Services Officer

EXHIBIT A

Janowski, Peter

From: Steve Ramsnamy <steveram194@gmail.com>
Sent: Friday, June 27, 2014 3:59 PM
To: Janowski, Peter
Subject: Letter to judge Schindlin

Hi your honor my name is Steve Ramsnamy I've been on home incarceration almost 11 months, I recently had my attorney submit a request to be on home detention and it was granted, but I made a mistake I thought that would have me on curfew so I can work, go to school and take my daughter out to kid shows, the park, beach etc. Spend time with my family as well since I know theres a chance I may go back in when the case is resolved. I've been incarcerated since my daughter was 2 months old I've never been able to go and take her out places now shes 17 months old. I would like to be put on the ankle monitoring curfew program or if possible be taken of the ankle monitor and will still report regularly to my pretrial officer. I just want to be able to spend as much time I can with my daughter and family as I can, i have already missed out on alot of family events. As you know on the 2nd of May I was told I will be able to look for work, by the 5th I already found employment and started I work Monday-Saturday, and Sundays when my officer allows me. I've been trying to go back to school since I was put on home detention but my pre trial officer just approved of it and July 5th I will be taking my placement exam to be placed in a GED program. Your honor im changing my life around for my daughter, my family and myself. Im working, signing up for school I have not been getting in any trouble I've been complying with my pre trial rules I feel going to school and spending time with my daughter and family is something I've earned. I would like to be switched to the curfew program, or even if possible be taken off of ankle monitoring and on regular bail as you see im changing my life around I have been complying with my pretrial rules and officer. Your honor I've made mistakes in the past and now im just trying to make things rite. Thanks alot for your time your honor and have a great day.

EXHIBIT B

Janowski, Peter

From: Gianfranco_Furelli@nyspt.uscourts.gov
Sent: Wednesday, July 23, 2014 3:10 PM
To: Janowski, Peter
Cc: jared.lenow@usdoj.gov; Izlia_Sanchez@nyspt.uscourts.gov;
Antonio_Rivera@nyspt.uscourts.gov
Subject: Steve Ramsnamy - Proposed bail modification

Peter,

I spoke to AUSA Jared Lenow regarding your proposed bail modification and he has deferred to Pretrial Services. I will consent to the removal of home detention enforced by location monitoring, provided that your client continues to maintain employment, attend GED classes and remain drug free. He will remain under strict Pretrial Services supervision with drug testing/treatment, along with the previous imposed conditions. Should he violate any of his bail conditions we will likely asked the Court to reinstate home detention/location monitoring.

Please speak to your client and submit your request to the Court.

Thanks,

Gianfranco Furelli
U.S. Pretrial Services Officer - SDNY
Location Monitoring Specialist
Office Tel.# (212) 805-4152
Office Fax.# (212) 805-4175

EXHIBIT C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
UNITED STATES OF AMERICA,

1:13-cr-00242-SAS-28

-against-

ECF CASE

MARK ALLIE, et al.
(STEVE RAMSNAMY)

**[PROPOSED] ORDER
AMENDING BAIL
CONDITIONS**

Defendants.
-----X

Upon submission by counsel for Defendant Steve Ramsnamy and upon consent
by Pre-trial Services and the government:

IT IS HEREBY ORDERED that the conditions of Mr. Ramsnamy's bail are
modified to eliminate home detention and to eliminate location monitoring.

All other conditions of bail will remain in effect.

Dated: New York, New York
_____, 2014

SO ORDERED.

Shira A. Scheindlin
United States District Judge